

No. 14—CR—637(4)

UNITED STATES OF AMERICA

VS.

DANIELA GOZES-WAGNER

UNITED STATE DISTRICT COURT, SDTX

HOUSTON DIVISION

JOINT PROPOSED HURRICANE HARVEY QUESTIONNAIRE QUESTIONS

T. B. Todd Dupont II, counsel for the Defendant, after conferencing with the United States government attorneys herein, and pursuant to Court Order, submits the following *Joint Proposed Hurricane Harvey Questionnaire Questions*:



1. Were you personally affected by Hurricane Harvey (“Harvey”)? _____
yes, or _____ no

2. If yes, how were you affected?

3. Did your home need any repairs as a result of Harvey? _____ yes, or
_____ no

4. If yes, please describe.

5. If you were not directly affected by Harvey, were any of your direct family or close friends directly affected by Harvey? _____ yes, or _____ no

6. If yes, how were they affected?

7. Did Harvey affect your work? _____ yes, or _____ no

8. If yes, how did Harvey affect your work?

9. Has Harvey affected your ability to make a living? _____ yes, or
_____ no

10. If yes, how has Harvey affected your ability to make a living?

11. Do you currently have Harvey victims living with you? _____ yes, or
_____ no

12. If yes, how has this affected your life?

13. Did you, or are you currently, volunteering in Harvey aid? _____ yes, or
_____ no

14. If yes, how did or do you volunteer your time?

15. Has your Harvey volunteer work affected you? _____ yes, or _____
no

16. If yes, how has your Harvey volunteer work affected you?

17. Did you have to make an insurance, FEMA, or any other claim for any
damage that you received as a result of Harvey? _____ yes, or _____ no

18. If yes, please describe.

19. Did you lose your main source of transportation as a result of Harvey?

_____ yes, or _____ no

20. If yes, what is your current mode of transportation?

21. Would you have any issues appearing daily at the Federal Courthouse for a jury trial that is scheduled to last about one week? _____ yes, or _____

no

22. If yes, what is the issue?

23. Are you currently awaiting an insurance adjuster, FEMA representative, or other person to handle a claim or make repairs for you as a result of Harvey?

_____ yes, or _____ no

24. If yes, please describe your situation.

25. As a result of Harvey, have you contributed to any relief agencies?

_____ yes, or _____ no

26. If yes, who did you contribute to?

27. Do you think the government is doing enough or not enough to help recovery? Please explain.

28. This trial is estimated to last about one week. Do you believe that any issues that you experienced because of Harvey would affect your ability to preside on this panel, and give the accused a fair and impartial trial?

29. Would missing one calendar week while you serve on this jury unduly affect your home, work, or life?

30. If yes, why do you feel this way?

31. Are you experiencing any post-traumatic stress disorder from Harvey?

32. Without knowing the facts of the case, do you believe that Harvey and its aftermath has upset you so much that you feel like you would want to take your frustrations out on someone in this case; for instance, the lawyers, the accused, the Federal Bureau of Investigation, the witnesses, the Court, or anyone else involved in this case?

33. This case involves allegations of health care fraud and money laundering. Due to Harvey, do you believe that right now may not be the best time for you to preside on a criminal case, given these allegations?

Respectfully submitted,

DUPONT ☉ DUPONT

By: /s/ T. B. Todd Dupont II

T. B. Todd Dupont II

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**LAWYER FOR DEFENDANT,
DANIELA GOZES-WAGNER**

CERTIFICATE OF SERVICE & CONFERENCE

I HEREBY CERTIFY THAT A TRUE AND CORRECT COPY OF THE FOREGOING INSTRUMENT HAS BEEN SERVED UPON THE ASSISTANT UNITED STATES ATTORNEY HEREIN, ON THE 20TH DAY OF SEPTEMBER, 2017. ON THE 20TH DAY OF SEPTEMBER, 2017, THE UNDERSIGNED CONFERENCED WITH AUSA MICHAEL CHU, AND HE IS **UNOPPOSED** TO THIS FILING.

DUPONT ★ DUPONT

By: /s/ T. B. Todd Dupont II
T. B. Todd Dupont II